

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
	:	DATE FILED: _____
v.	:	
	:	VIOLATIONS:
<b>ALLEN S. STRATTON</b>	:	21 U.S.C. § 841(a)
<b>a/k/a “Neck Bone”</b>	:	(distribution of crack cocaine)
	:	3 Counts
	:	21 U.S.C. § 841(a)
	:	(possession with intent to distribute
	:	crack cocaine)
	:	1 Count
	:	21 U.S.C. § 860(a)
	:	(violation of 21 U.S.C. § 841(a)
	:	within 1,000 feet of a school)
	:	4 Counts
	:	18 U.S.C. § 924(c)(1)(A)(i)
	:	(possession of a firearm in
	:	furtherance of a drug trafficking
	:	crime)
	:	1 Count
	:	18 U.S.C. §922(g)(1)
	:	(felon in possession of firearm)
	:	1 Count
	:	21 U.S.C. § 853
	:	(notice of forfeiture)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about December 14, 1998, in or about 1311 Webster Street, in the City of Philadelphia, within the Eastern District of Pennsylvania, defendant

**ALLEN S. STRATTON**  
**a/k/a “Neck Bone”**

knowingly and intentionally distributed a mixture or substance containing a detectible amount of cocaine base (“crack”), a Schedule II narcotic drug controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 14, 1998, in or about 1311 Webster Street, in the City of Philadelphia, within the Eastern District of Pennsylvania, defendant

**ALLEN S. STRATTON**  
**a/k/a “Neck Bone”**

knowingly and intentionally distributed a mixture or substance containing a detectible amount of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, within 1,000 feet of the real property comprising public elementary and secondary schools, that is, the High School for the Creative & Performing Arts, 901 South Broad Street, Philadelphia, Pennsylvania, and the Frank Palumbo Elementary School, 11th & Catharine Streets, Philadelphia, Pennsylvania.

In violation of Title 21, United States Code, Section 860(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 14, 1998, at or about the 1300 block of Webster Street, in the City of Philadelphia, within the Eastern District of Pennsylvania, defendant

**ALLEN S. STRATTON**  
**a/k/a “Neck Bone”**

knowingly and intentionally distributed a mixture or substance containing a detectible amount of cocaine base (“crack”), a Schedule II narcotic drug controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 14, 1998, at or about the 1300 block of Webster Street, in the City of Philadelphia, within the Eastern District of Pennsylvania, defendant

**ALLEN S. STRATTON**  
**a/k/a “Neck Bone”**

knowingly and intentionally distributed a mixture or substance containing a detectible amount of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, within 1,000 feet of the real property comprising a public secondary school, that is, the High School for the Creative & Performing Arts, 901 South Broad Street, Philadelphia, Pennsylvania.

In violation of Title 21, United States Code, Section 860(a).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 15, 1998, at or about the 1300 block of Webster Street, in the City of Philadelphia, within the Eastern District of Pennsylvania, defendant

**ALLEN S. STRATTON**  
**a/k/a “Neck Bone”**

knowingly and intentionally distributed a mixture or substance containing a detectible amount of cocaine base (“crack”), a Schedule II narcotic drug controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 15, 1998, at or about the 1300 block of Webster Street, in the City of Philadelphia, within the Eastern District of Pennsylvania, defendant

**ALLEN S. STRATTON**  
**a/k/a “Neck Bone”**

knowingly and intentionally distributed a mixture or substance containing a detectible amount of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, within 1,000 feet of the real property comprising a public secondary school, that is, the High School for the Creative & Performing Arts, 901 South Broad Street, Philadelphia, Pennsylvania.

In violation of Title 21, United States Code, Section 860(a).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 15, 1998, in or about 1313 Webster Street, in the City of Philadelphia, within the Eastern District of Pennsylvania, defendant

**ALLEN S. STRATTON**  
**a/k/a “Neck Bone”**

knowingly and intentionally possessed with intent to distribute approximately 6 grams of a mixture or substance containing a detectible amount of cocaine base (“crack”), a Schedule II narcotic drug controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).



COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 15, 1998, in or about 1313 Webster Street, in the City of Philadelphia, within the Eastern District of Pennsylvania, defendant

**ALLEN S. STRATTON**  
**a/k/a “Neck Bone”**

knowingly and intentionally possessed with intent to distribute approximately 6 grams of a mixture or substance containing a detectible amount of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, within 1,000 feet of the real property comprising public elementary and secondary schools, that is, the High School for the Creative & Performing Arts, 901 South Broad Street, Philadelphia, Pennsylvania, and the Frank Palumbo Elementary School, 11th & Catharine Streets, Philadelphia, Pennsylvania.

In violation of Title 21, United States Code, Section 860(a).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 15, 1998, in the City of Philadelphia, within the Eastern District of Pennsylvania, defendant

**ALLEN S. STRATTON**  
**a/k/a “Neck Bone”**

knowingly possessed a firearm, one Smith & Wesson .38 caliber revolver, serial number 1K23897, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, distribution of cocaine base (“crack”) and possession with intent to distribute cocaine base, as alleged in Counts Five through Eight of this Indictment, in violation of Title 21, United States Code, Section 841(a).

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about December 15, 1998, in the City of Philadelphia, within the Eastern District of Pennsylvania, defendant

**ALLEN S. STRATTON**  
**a/k/a “Neck Bone”**

having been previously convicted in the Court of Common Pleas of Philadelphia of an offense punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, one Smith & Wesson .38 caliber revolver, serial number 1K23897.

In violation of Title 18, United States Code, Sections 922(g)(1).

## NOTICE OF FORFEITURE

1. The allegations of Counts One through Eight of this Indictment are incorporated by reference in this Notice of Forfeiture as if set forth at length below.

2. As a result of the violation of Title 21, United States Code, Section 841(a) set forth in Counts One through Eight of this Indictment, ALLEN S. STRATTON shall forfeit to the United States of America, pursuant to Title 21, United States Code, Section 853, the following property:

A. Any and all interest ALLEN S. STRATTON may have in real or personal property used, or intended to be used, in any manner or part to commit or to facilitate the commission of the violation of Title 21, United States Code, Sections 841(a) and 860(a) set forth in Counts One through Eight of the Indictment, including but not limited to the following:

1. \$400.00 in United States Currency seized from a bedroom in 1313 Webster Street, Philadelphia, PA on or about December 15, 1998;
2. \$86.00 in United States Currency seized from the person of ALLEN S. STRATTON and from the highway on or about December 15, 1998;
3. one Smith & Wesson .38 caliber revolver, serial number 1K23897.

B. Any and all interest of ALLEN S. STRATTON in real and personal property constituting or derived from any proceeds that ALLEN S. STRATTON obtained, directly or indirectly, as a result of the violation of Title 21, United States Code, Sections 841(a) and 860(a) set forth in Counts One through Eight of the Indictment.

3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of ALLEN S. STRATTON

- a. Cannot be located upon the exercise of due diligence;

- b. Has been transferred or sold to, or deposited with, a third person;
- c. Has been placed beyond the jurisdiction of the court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other real or personal property of the defendant up to the value of the property listed above as being subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

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FOREPERSON

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MICHAEL R. STILES  
United States Attorney